

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

MARK FLORA

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VS.

C.A. NO. 4:19-CV-2328

TRANSOCEAN DRILLING  
(USA), INC., ET AL.

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**LLOG EXPLORATION OFFSHORE, L.L.C.'S  
INITIAL DISCLOSURES**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Defendant LLOG Exploration Offshore, L.L.C. (“LLOG”) serves the following initial disclosures. LLOG expressly reserves the right to supplement its initial disclosures pursuant to Rule 26(e). In making these disclosures, LLOG does not waive any objections or claims of privilege or protection otherwise applicable to these disclosures.

**1. Identity of individuals likely to have discoverable information**

**a. Mark Flora**

c/o John Sheppard  
Morrow & Sheppard LLP  
3701 Kirby Drive, Suite 1000  
Houston, Texas 77098  
Tel.: (713) 489-1206

Mr. Flora is the plaintiff in this case and has discoverable information regarding his claims and the defendants’ defenses.

**b. Grand Isle Shipyard, LLC  
GIS, LLC (Grand Isle Shipyards, LLC)**

c/o Michael D. Williams  
Brown Sims, P.C.  
1177 West Loop South  
Tenth Floor  
Houston, Texas 77027  
Tel.: (713) 629-1580

Corporate representatives of Grand Isle Shipyards may have discoverable information regarding the parties' claims and defenses.

**c. Adam Simoneaux, HSE Specialist and Trainer, Grand Isle Shipyard, LLC**

c/o Michael D. Williams  
Brown Sims, P.C.  
1177 West Loop South  
Tenth Floor  
Houston, Texas 77027  
Tel.: (713) 629-1580

Mr. Simoneaux is an employee of Grand Isle Shipyards and may have discoverable information regarding the parties' claims and defenses.

**d. Eric Callais, Corporate HSE Director, Grand Isle Shipyard, LLC**

c/o Michael D. Williams  
Brown Sims, P.C.  
1177 West Loop South  
Tenth Floor  
Houston, Texas 77027  
Tel.: (713) 629-1580

Mr. Callais is an employee of Grand Isle Shipyards and may have discoverable information regarding the parties' claims and defenses.

**e. Seadrill Gulf Operations Neptune LLC**

c/o Robert L. Klawetter  
Eastham Watson Dale & Forney LLP  
The Niels Esperson Building  
808 Travis Street, Suite 1300  
Houston, Texas 77002  
Tel.: (713) 291-1240

Corporate representatives of Seadrill Gulf Operations Neptune LLC may have discoverable information regarding the parties' claims and defenses.

**f. Gulf Logistics Operating, LLC**

c/o Alan J. Meche  
Allen & Gooch  
P.O. Box 81129  
Lafayette, Louisiana 70598  
Tel.: (337) 291-1240

Corporate representatives of Gulf Logistics Operating, LLC may have discoverable information regarding the parties' claims and defenses.

**g. Gulf Logistics, LLC**

c/o Alan J. Meche  
Allen & Gooch  
P.O. Box 81129  
Lafayette, Louisiana 70598  
Tel.: (337) 291-1240

Corporate representatives of Gulf Logistics, LLC may have discoverable information regarding the parties' claims and defenses.

**h. LLOG Exploration Offshore, L.L.C.**

c/o Michael G. Lemoine  
Jones Walker LLP  
P.O. Box 3408  
Lafayette, Louisiana 70502  
Tel.: (337) 593-7607

Corporate representatives of LLOG Exploration Offshore, L.L.C. may have discoverable information regarding the parties' claims and defenses.

**i. Former and current representatives of Transocean Drilling (USA) Inc.**

Contact information unknown

Corporate representatives of Transocean Drilling (USA) Inc. may have discoverable information regarding the parties' claims and defenses.

**j. Former and current representatives of Gulf Logistics Services, LLC**

Contact information unknown

Corporate representatives of Gulf Logistics Services, LLC may have discoverable information regarding the parties' claims and defenses.

**k. C&G Boats, Inc.**

1216 South Bayou Drive  
Golden Meadow, Louisiana 70357

Corporate representatives of C&G Boats, Inc. may have discoverable information regarding the parties' claims and defenses.

**l. Plaintiff's medical providers, including**

1. Dr. Sun Nguyen, North Loop Minor Emergency Care, 615 North Loop East 100, Houston, Texas 77022, Tel.: (832) 380-2580.
2. Michael Roberts, DC, Southeast Injury Clinic, 8866 Gulf Freeway, Suite 122, Houston, Texas, 77017, Tel.: 832-834-5096.
3. Dr. Nicholas Iwasko, MRI Centers of Texas – Houston, 1414 South Loop West, Suite 120, Houston, Texas 77054, Tel.: (866) 931-3811.
4. Dr. Andrew Lee, Spine & Orthopedic Surgical Institute, 2656 South Loop West, Suite 595, Houston, Texas 77054, Tel.: (346) 980-8700.
5. Dr. Gregory P. Harvey, Patient First Orthopedics, 4802 E. Sam Houston Parkway South, Suite 110, Pasadena, Texas 77505, Tel.: (281) 487-1111.

**m. Expert Witnesses** – to be determined with the Court's Scheduling Order.

**n. Persons identified in discovery responses and disclosures by any party**

LLOG incorporates by reference any witness identified by any party in any discovery responses or disclosure responses (including in any documents voluntarily produced by any party).

**2. Relevant documents**

LLOG is in the process of searching for relevant documents and/or other items, and will produce any responsive documents as they are located.

**3. Computation of damages**

LLOG has not asserted a claim for damages at this time.

**4. Insurance agreements**

LLOG is unaware of any applicable insurance agreements at this time.

Dated: January 13, 2020

Respectfully submitted,

**JONES WALKER LLP**

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and

/s/ Daniel J. Baldwin  
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**ATTORNEYS FOR DEFENDANT  
LLOG EXPLORATION OFFSHORE,  
L.L.C.**

**CERTIFICATE OF SERVICE**

I certify that I that I forwarded a true and correct copy of the foregoing to all counsel of record on this the 13<sup>th</sup> day of January 2020.

**Via Electronic Mail**

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/s/ Daniel J. Baldwin

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